<center>**Attachment A**</center>

<center>**DECLARATION OF SHERI HICKS**</center>

1.　　I am Sheri Hicks, Policy Director for TEXALTEL, a trade association that represents competitive telecommunications carriers doing business in Texas.

2.　　The purpose of my declaration is to provide factual support for the "Request to Refresh Record and Take Expedited Action to Update Copper Retirement Rules to Promote Affordable Broadband Over Copper" filed by TelePacific and other parties in WC Docket Nos. 10-188, 12-353; GN Docket Nos. 09-51, 13-5 and RM-11358. In particular, this Declaration provides information from CLECs operating in the state of Texas who have invested in the deployment of Ethernet over Copper equipment and are now using those investments to provide broadband and other communications services to their consumer and business customers.

3.　　I have personal knowledge of all facts stated in my declaration.

<center>**Ethernet over Copper – A Snapshot in Texas**</center>

Background

4.　　In November 2012, TEXALTEL asked members to list the wire centers in Texas where the companies have invested in and deployed Ethernet-over-Copper ("EoC") transmission equipment in order to provide the Federal Communications Commission ("FCC") with data regarding the continued value of the ILECs' copper loop plant in providing broadband services to customers.

5.　　 TEXALTEL received EoC deployment information from four TEXALTEL members and two additional CLECs to total six CLECs surveyed.

6.   Sheri Hicks, Policy Director at TEXALTEL, aggregated the information provided by each CLEC,[1] and then combined this information with data from Merigold Technologies Central Office Look-up[2] database of Texas businesses located within a CLEC EoC equipped wire center.

7.   Based on the combination of the aggregated CLEC wire center list with Central Office Look-up data of businesses within a wire center, Ms. Hicks prepared summary spreadsheets displaying the availability and ubiquity of CLEC EoC service alternatives in the TEXALTEL prepared coverage maps of the EoC served cities by participating CLECs statewide.

Analysis of the Data

8.   The data compiled shows that the six CLECs participating in this exercise have invested in and installed EoC capability in 139 different wire centers in Texas.

9.   In those 139 wire centers, approximately 400,000 businesses have access to broadband services via EoC provided by one or more of the CLECs that provided data[3].

10.   In thirty-six percent (28%) of these wire centers, there are at least three different CLECs to choose from for EoC-based broadband service.

11.   Attached are several exhibits identifying these wire centers.

12.   Exhibit A shows the list of all 139 wire centers.

13.   Exhibit B shows that out of the 139 wire centers covered by these 6 CLECs, there are 73 where a single CLEC has deployed EoC; 27 where at least two CLECs have deployed

---

[1]   Non-disclosure agreements protect the confidentiality of such sensitive business information and limit its use for advocacy before the FCC.
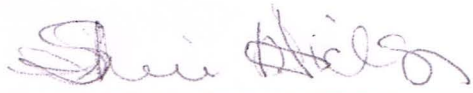
[2]   Merigold Technologies is a direct marketing acquisition firm that provides strategic list services for telecommunications, information technology, retail and financial industries.

[3] Due to some geographic limitations, Ethernet over Copper cannot serve all of the businesses in each wire center. However, it can serve the densest portion of businesses within 12,000 feet of the ILEC central office. There are a total of 439,762 businesses in the wire centers. Therefore the number of total businesses with access is a fairly reasonable approximation.

EOC; 18 where three CLECs have deployed EoC; and 21 where more than four CLECs have deployed EoC.

14.   Also attached as Exhibit C is a partial statewide map of Texas showing the dispersal of the 139 wire centers across the state.

I declare under penalty of perjury that the foregoing is true and correct.

_____

Sheri Hicks
Policy Director
TEXALTEL

Executed on: March 5, 2013

                Austin, Texas

EXHIBIT A TO DECLARATION OF SHERI HICKS

List of Texas Wire Centers with EoC Deployment

ALLNTXSA
AUSTTXBC
AUSTTXCV
AUSTTXEV
AUSTTXFA
AUSTTXFI
AUSTTXGR
AUSTTXHI
AUSTTXHO
AUSTTXJO
AUSTTXLE
AUSTTXMC
AUSTTXPF
AUSTTXRR
AUSTTXTE
AUSTTXTW
AUSTTXWA
CRCHTXTE
CRCHTXTU
CRCHTXWY
CRTNTXXA
CRTNTXXD
DLLSTXAD
DLLSTXDA
DLLSTXDI
DLLSTXDN
DLLSTXDS
DLLSTXDV
DLLSTXEM
DLLSTXEV
DLLSTXFB
DLLSTXFE
DLLSTXFL
DLLSTXFR
DLLSTXGP
DLLSTXHA
DLLSTXLA
DLLSTXLN

EXHIBIT A TO DECLARATION OF SHERI HICKS
List of Texas Wire Centers with EoC Deployment

DLLSTXMC
DLLSTXME
DLLSTXMS
DLLSTXNM
DLLSTXNO
DLLSTXRE
DLLSTXRI
DLLSTXRN
DLLSTXRO
DLLSTXSU
DLLSTXTA
DLLSTXWH
DNTNTXXA
FRSCTXES
FTWOTXAR
FTWOTXAT
FTWOTXAX
FTWOTXBN
FTWOTXBU
FTWOTXBY
FTWOTXCE
FTWOTXCI
FTWOTXCR
FTWOTXEC
FTWOTXED
FTWOTXEU
FTWOTXGL
FTWOTXJE
FTWOTXKE
FTWOTXMA
FTWOTXPE
FTWOTXTE
FTWOTXWA
GRLDTXXA
GRLDTXXB
GRPVTXXA
HRLNTXHG
HSTNTXAD
HSTNTXAI
HSTNTXAL
HSTNTXAP

EXHIBIT A TO DECLARATION OF SHERI HICKS
List of Texas Wire Centers with EoC Deployment

HSTNTXBA
HSTNTXBR
HSTNTXBU
HSTNTXCA
HSTNTXCH
HSTNTXCL
HSTNTXDP
HSTNTXEE
HSTNTXFA
HSTNTXGL
HSTNTXGP
HSTNTXGR
HSTNTXHO
HSTNTXHU
HSTNTXJA
HSTNTXLA
HSTNTXLP
HSTNTXMA
HSTNTXMC
HSTNTXMI
HSTNTXMO
HSTNTXNA
HSTNTXNE
HSTNTXOR
HSTNTXOV
HSTNTXOX
HSTNTXPE
HSTNTXPR
HSTNTXRI
HSTNTXSA
HSTNTXSU
HSTNTXUN
HSTNTXWA
HSTNTXWE
IRNGTXXA
IRNGTXXG
LARDTXLA
LWVLTXXE
MCALTXMU
MCKNTXLI

EXHIBIT A TO DECLARATION OF SHERI HICKS
List of Texas Wire Centers with EoC Deployment

PLANTXXA

PLANTXXB

RONKTXWO

RSBGTXRR

SNANTXBA

SNANTXCA

SNANTXCU

SNANTXDA

SNANTXDI

SNANTXFR

SNANTXMC

SNANTXPE

SNANTXTA

SNANTXWE

SPRNTXNO

SPRNTXSO

STFRTXXA

TBLLTXKL

TBLLTXTB

WXHCTXWE

EXHIBIT B TO DECLARATION OF SHERI HICKS

TEXALTEL - EoC Wire Center Summary

Wire centers with a single CLEC with EOC equipment deployed	73
Wire centers with up to 2 CLECs with EoC equipment deployed	27
Wire centers with 3 CLECs with with EoC equipment deployed	18
Wire centers with 4 or more	21

EXHIBIT C TO DECLARATION OF SHERI HICKS

Partial map of the State of Texas with the most populated wire centers